## UNITED STATES DISTRICT COURT

## FOR THE

## MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

**Plaintiff** 

CIVIL NO.

VS.

**CATHERINE S. LOVETT** 

**Defendants** 

## **COMPLAINT**

The United States of America, on behalf of its Agency, Department of Health and Human Services, by its specially appointed counsel, Michael McKeever of KML LAW GROUP, P.C., represents as follows:

- 1. This Court has jurisdiction pursuant to 28 U.S.C. 1345.
- 2. The last-known address(es) of the Defendants, CATHERINE S. LOVETT ("Defendants") is 99 Clyde Rd, Benton, PA 17814.
- 3. That the defendant is indebted to the plaintiff in principal amount of \$13,532.00, plus interest in the amount of \$11,544.07, for a total of \$25,076.07. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit "A" ("Certificate of Indebtedness").
- 4. Demand has been made upon Defendant by Plaintiff for the sum due but the amount due remains unpaid.

WHEREFORE, the plaintiff demands judgment against Defendant as follows;

- (A) In the amount \$25,076.07.
- (B) Interest from the date of judgment at the legal rate of interest in effect on the date of judgment until paid in full.
- (C) Costs of suit.

Notice is hereby given to Defendant that Plaintiff intends to seek satisfaction of any judgment rendered in it favor in this action from any debt accruing.

United States of America by and through its specially assigned counsel KML Law Group, P.C.

By: /s/ Michael McKeever Michael McKeever, Esq. 701 Market Street Suite 5000 Philadelphia, PA 19106-1532 (215)825-6305 MMcKeever@kmllawgroup.com